



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
NEW ENGLAND - REGION I
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BOSTON, MASSACHUSETTS 02114-2023

June 21, 2007
Orlando Monaco
Dept of the Navy, BRAC PMO Northeast
Code 5090 BPOM NE/LM, 4911 South Broad St
Philadelphia, PA 19112-1303

Re: *Response to EPA Comments on the Draft Final Site Inspection (SI) Work Plan for the Military Munitions Response Program at the Naval Air Station Brunswick, Maine, dated May 2007*

Dear Mr. Monaco:

Pursuant to § 6 of the Naval Air Station Brunswick, Maine Federal Facility Agreement dated October 19, 1990, as amended (FFA), the Environmental Protection Agency has reviewed the subject document and comments are below:

General Comments

2. Expansion of the soil analytes to the full Target Analyte List (TAL) is a welcome response to the concern for metals in addition to lead. This will result in far more complete characterization.

The original Comment also requested the rationale for neglect of propellant compounds at the skeet ranges. The Response states that black powder is "usually" the propellant for shotguns. While this may be the case, modern shotgun shells are often made with "double-base" (smokeless) powder. For this reason, it is recommended that at least a few soil samples immediately downrange of the firing points be analyzed for nitroglycerin. Alternatively, if further research can demonstrate that the advent of double-base shotgun shells post-dates the use of the ranges, this might be reconsidered.

3. The original Comment raised a concern for the lack of groundwater characterization for most sites considered, particularly for Former Munitions Bunker West Area and the Former Machine Gun Boresight Range. The Response commits to groundwater characterization at these sites via five temporary monitoring wells. This Response is welcome. The Response is not specific with respect to proposed analytes. It is recommended that groundwater at these two sites be analyzed for propellants, nitroglycerin, perchlorate, VOC, SVOC, pesticides, and TAL metals.

If you have any questions with regard to this letter, please contact me at (617) 918-1384.

Sincerely,

Christine A.P. Williams, RPM
Federal Facilities Superfund Section

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